

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ELIZABETH GOMES, EVA M. CONNORS,
JENNIFER BOWEN, KATISHA
SHOULDERS, KENNETH N. MARENGA,
PAMELA PRISCO CARPENTER, STEVEN
PETERS, ZHANNA KARP, Individually, and
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

STATE STREET CORPORATION, STATE
STREET BANK & TRUST COMPANY,
NORTH AMERICA REGIONAL
BENEFITS COMMITTEE OF STATE
STREET CORPORATION, INVESTMENT
COMMITTEE OF STATE STREET
CORPORATION, and JANE and JOHN
DOES 1-20,

Defendants.

Civil Action No. 1:21-cv-10863-MLW

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, ADMINISTRATIVE EXPENSES,
AND CASE CONTRIBUTION AWARD**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on August 8, 2024, at 2:00 p.m., in Courtroom 2 of the United States District Court for the District of Massachusetts in Boston, MA, Plaintiffs Elizabeth Gomes, Eva M. Connors, Jennifer Bowen, Katisha Shoulders, Kenneth N. Marenga, Pamela Prisco Carpenter, Steven Peters, and Zhanna Karp (collectively, "Plaintiffs") will and hereby do move this Court for an Order awarding: (1) attorneys' fees to Class Counsel in the amount of \$1,433,333.33 (one-third of the \$4,300,000 Gross Settlement Amount); (2) reimbursement of

\$115,030.38 in litigation costs; (3) payment of Settlement Administration Expenses¹; and (4) case contribution awards in the amount of \$5,000 each to the named Plaintiffs, which shall be paid from the Qualified Settlement Fund. *See* Settlement Agreement, ECF No. 86-2, §§1.47; 9.2.2.

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Sections 3.2.5, 11.1, and 11.2 of the Parties' Class Action Settlement Agreement (ECF No. 86-1) and is based on the accompanying Memorandum of Law and authorities cited therein, the Declarations of Daryl F. Scott and Jamie L. Falgout, the previously filed declarations of the Class Representatives (ECF Nos. 87-94), the Settlement Agreement, and all files, records, and proceedings in this matter.

Counsel for Plaintiffs have conferred with counsel for Defendants regarding this motion and have been advised that Defendants take no position on this motion. As of the filing of this motion, there also have been no objections from Class Members to the proposed attorneys' fees and costs, administrative expenses, or case contribution awards.

Dated: June 24, 2024

Respectfully submitted,
SCOTT+SCOTT ATTORNEYS AT LAW LLP

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¹ These expenses include implementation of the Settlement and the Plan of Allocation, including the fees and expenses associated with the Independent Fiduciary, the Plan's recordkeeper's collection and provision of Settlement Class member data to the Settlement Administrator, the Plan's recordkeeper's processing and distribution of each Participant Settlement Class member's Final Individual Dollar Recovery into their individual Plan accounts (including audits related to the processing and distribution of the Final Individual Dollar Recovery performed by the recordkeeper), the Settlement Administrator's processing and distribution of any payments, distributions or rollovers of each Former Participant Settlement Class member's Final Individual Dollar Recovery, and the distribution of the Class Action Fairness Act ("CAFA") notices concerning the Settlement, and shall be paid from the Qualified Settlement Fund. *See* Settlement Agreement, ECF No. 86-2, §§1.47, 9.2.2.

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Attorneys for Plaintiffs

LOCAL RULE 7.1(A)(2) CERTIFICATE

I hereby certify that on June 21, 2024, counsel for Plaintiffs conferred with Counsel for Defendants, who take no on position this Motion for Attorneys' Fees, Administrative Expenses, and Case Contribution Awards.

/s/ Garrett W. Wotkyns
Garrett W. Wotkyns, *admitted pro hac vice*
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system to send notification of such filing to all counsel of record.

/s/ Garrett W. Wotkyns
Garrett W. Wotkyns, *admitted pro hac vice*

Counsel for Plaintiffs